Reilley D. Keating, OSB No. 073762 rdkeating@stoel.com
Peter D. Sax, OSB No. 101969 pdsax@stoel.com
STOEL RIVES LLP
900 SW Fifth Avenue, Suite 2600
Portland, OR 97204

Telephone: (503) 224-3380 Facsimile: (503) 220-2480

Angela M. Taylor, CA State Bar No. 210425 Admitted Pro Hac Vice JONES DAY 3161 Michelson Drive, Suite 800 Irvine, CA 92612

Telephone: Facsimile:

(949) 851-3939 (949) 553-7539

E-mail:

angelataylor@jonesday.com

Attorneys for Defendant Experian Information Solutions, Inc.

UNITED STATES DISTRICT COURT DISTRICT OF OREGON

NICKALAS BRADSHAW, MEGAN BRADSHAW,

Plaintiffs,

v.

BAC HOME LOANS SERVICING, LP, a foreign corporation; TRANS UNION, LLC, a foreign company; EXPERIAN INFORMATION SOLUTIONS, INC., a foreign corporation, and EQUIFAX INFORMATION SERVICES LLC, a foreign corporation.

Defendants.

Case No. 10-0438-HA

DECLARATION OF ANGELA M.
TAYLOR IN SUPPORT OF EXPERIAN
INFORMATION SOLUTIONS, INC.'S
MOTION FOR SUMMARY JUDGMENT

DECLARATION OF ANGELA M. TAYLOR

- I, Angela M. Taylor, declare and state as follows:
- 1. I am an attorney at law duly licensed to practice before all of the Courts in the State of California and am an attorney in the firm of Jones Day, counsel for Defendant Experian Information Solutions, Inc. ("Experian") in the above-captioned action. I have been admitted *pro hac* vice in this action, and I am one of the attorneys responsible for representing Experian. I have personal knowledge of the matters stated herein, and if called upon to do so, could and would testify competently thereto.
 - 2. I make this Declaration in support of Experian's Motion for Summary Judgment.
- 3. On January 27, 2011, I attended the Deposition of Plaintiff Nikalas Bradshaw in Portland, Oregon. Relevant excerpts from Mr. Bradshaw's Deposition are attached hereto as Exhibit "A."
- 4. On April 6, 2011, counsel for defendant Trans Union LLC deposed Plaintiff Nikalas Bradshaw. I attended this deposition via telephone. Relevant excerpts from Mr. Bradshaw's second day of deposition are attached hereto as Exhibit "B."
- 5. On January 27, 2011, I attended the Deposition of Plaintiff Megan Bradshaw in Portland, Oregon. Relevant excerpts from Ms. Bradshaw's Deposition are attached hereto as Exhibit "C."

I declare under penalty of perjury that the foregoing is true and correct, and that this Declaration was made this 22nd day of June, 2011, in Irvine, California.

Angela M Taylor

CERTIFICATE OF SERVICE

I, Angela M. Taylor, declare:

I am a citizen of the United States and employed in Orange County, California. I am over the age of eighteen years and not a party to the within-entitled action. My business address is 3161 Michelson Drive, Suite 800, Irvine, California 92612. On June 22, 2011, I served a copy of the DECLARATION OF ANGELA M. TAYLOR IN SUPPORT OF EXPERIAN INFORMATION SOLUTIONS, INC.'S MOTION FOR SUMMARY JUDGMENT by electronic transmission.

I am familiar with the United States District Court of Oregon's practice for collecting and processing electronic filings. Under that practice, documents are electronically filed with the court. The court's CM/ECF system will generate a Notice of Electronic Filing (NEF) to the filing party, the assigned judge, and any registered users in the case. The NEF will constitute service of the document. Registration as a CM/ECF user constitutes consent to electronic service through the court's transmission facilities. Under said practice, the following CM/ECF users were served:

Justin M. Baxter
Baxter & Baxter, LLP
8835 S.W. Canyon Lane
Suite 130
Portland, OR 97225-3429
(503)297-9031
(503) 291-9172 (fax)
justin@baxterlaw.com
Attorneys for Plaintiff

William R. Brown
Breanne J. Strubinger
Schuckit & Associates, PC
4545 Northwestern Drive
Zionsville, IN 46077
(317) 363-2400
(317) 363-2257 (fax)
wbrown@schuckitlaw.com
bstrubinger@schuckitlaw.com
Attorneys for Trans Union, LLC

Executed on June 22, 2011, at Irvine, California.

/s/ Angela M. Taylor
Angela M Taylor